

June 21, 2010

VIA ELECTRONIC FILING AND HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: MB docket No. 10-56 Applications of Comcast Corporation, General Electric Company, and NBC Universal, Inc. for Consent to Assignment of Licenses or Transfer of Control of Licenses

Dear Ms. Dortch:

Transmitted herewith on behalf of our client, Trail Blazers, Inc., are an original and the requisite number of copies of a letter from its President, Larry Miller, in the above-captioned matter. Please associate this letter with the record of that docketed proceeding. Also enclosed with the hand-delivered version of this letter is DVD containing a complete recording of a February 24, 2010 hearing before the Oregon House Committee on Consumer Protection and Government Accountability addressing the limited availability of Trail Blazers professional basketball games on multichannel video program distributors in greater Portland and throughout the State of Oregon.

Please direct any inquiries concerning this letter and enclosure to undersigned counsel for Trail Blazers, Inc.

Sincerely,



Mitchell F. Brecher

Cc: Ms. Jessica Almond
Ms. Vanessa Lamme
Kathryn A. Zachem, Esq.
Brackett B. Denniston, III, Esq.
Richard Cotton, Esq.

enclosure

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445 12th Street, SW
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Re: MB Docket No. 10-56: Applications of Comcast Corporation, General Electric Company, and NBC Universal, Inc. for Consent to Assignment of Licenses or Transfer of Control of Licenses

Dear Ms. Dortch:

I am the President of Trail Blazers Inc. ("TBI"), which owns and operates the "Portland Trail Blazers" National Basketball Association ("NBA") franchise in Portland, Oregon. The purpose of this letter is to alert the Commission and to place on the record in this proceeding certain factual information regarding the conduct of Comcast SportsNet Northwest, LLC ("CSN") -- a Comcast affiliate which we believe is relevant to the Commission's evaluation of whether the above-captioned transaction, unless appropriately conditioned, will serve the public interest.

In May 2007, TBI entered into a telecast contract with CSN for distribution of certain Trail Blazers basketball games throughout the greater Portland area, the state of Oregon, and Western Washington. Shortly thereafter, CSN and TBI held a press conference at the Rose Garden Arena (where the Trail Blazers play their home games) during which CSN announced it would be launching "Comcast SportsNet Northwest," a new regional sports network based in Portland. At that press conference, CSN's President, Jon Litner, publicly represented that "Comcast SportsNet will dramatically increase exposure for the Trail Blazers and bring sports fans more news, updates, and analysis about the teams, players, and games that they care about the most." CSN further stated that it would be "made available to other cable and satellite providers throughout the region."

Unfortunately, by the start of the 2007-2008 NBA Season, the first season covered under the telecast contract, CSN had not increased exposure of the Trail Blazers games as promised. In fact, it had not completed a single affiliation agreement with any satellite television or cable operator other than its own corporate affiliate, Comcast. As a result, hundreds of thousands of Trail Blazers fans who previously had been able to access the Trail Blazers games via their preferred multichannel video programming distributor were no longer able to do so. In the words of John Canzano, a sports columnist for *The Oregonian*, Portland's largest daily newspaper, Trail Blazers fans were being "held hostage" by CSN. Now, three years later, they continue to be held hostage.

During the 2007-2008 NBA Season, the Trail Blazers received increasingly negative feedback about CSN and Comcast from many members of the viewing public throughout the Portland area, the state of Oregon, and Western Washington, including fans, season ticket holders, suite clients, sponsors, and the media. The Trail Blazers received thousands of emails


and letters from upset fans complaining that they could no longer watch Trail Blazers games via their satellite or cable service providers. Local media coverage continued to highlight the lack of game access, recorded widespread fan frustration, and sharply criticized the Trail Blazers for the lack of availability of game telecasts, particularly via satellite on DirecTV and Dish Network, and via cable providers other than Comcast.

The Trail Blazers were not the only entity receiving complaints about withholding of the games. Members of the Oregon Legislature also heard from many angry constituents about the lack of distribution of Trail Blazers games. On February 24, 2010, the Consumer Protection and Government Accountability Committee of the Oregon House of Representatives held a hearing on this lack of availability of Comcast's Trail Blazers telecasts. Documentation of the testimony presented during that hearing is being hand-delivered to your office with a hard copy version of this letter today.

For the reasons described in this letter, the Trail Blazers respectfully submit that Comcast has used its dominant position in the distribution of video programming throughout greater Portland, the state of Oregon, and Western Washington to limit access to Trail Blazers games by many of those consumers who care most about access -- loyal and enthusiastic Trail Blazers fans. Given this record of utilizing its control over such programming and its market dominance in multichannel video programming services, we fear that allowing Comcast to acquire invaluable NBCU programming will increase its ability and its incentive to engage in such conduct unless the Commission's consent to the proposed license assignment and transfers is appropriately conditioned.

On behalf of the hundreds of thousands of Trail Blazers fans in both Oregon and Washington, who are no longer able to view the Trail Blazers games, we urge the Commission to condition any consent to the license transfers and assignment in this proceeding on a requirement that Comcast authorize distribution of Trail Blazers games by competing multichannel video program distributors in accordance with its promise to the Trail Blazers and to our fans throughout Oregon and Washington.

Very truly yours,



Larry Miller
President

Enclosures (hand-delivered with hard copy version)